

EXHIBIT C

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:)
)
)
PG&E CORPORATION,)
) Bankruptcy Case
)
-and-) No. 19-30088(DM)
)
)
PACIFIC GAS and ELECTRIC)
COMPANY,)
)
Debtors.)
)

RULE 30(b)(6) VIDEOTAPED DEPOSITION of BAUPOST
BY: JOSHUA GREENHILL

TAKEN ON

TUESDAY, OCTOBER 15, 2019

REPORTED BY:

JESSIE WAACK, RDR, CRR, CCRR, CCR, NYACR, NYRCR
JOB NO.: 170325

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Q. My only question about the document, sir, is if you look at the page numbers on the bottom of the page, page 4, you will see Baupost identified on that page as well as a statement of Baupost's holdings of both subrogation claims and common stock.

Do you see that?

A. I do.

Q. My only question to you, sir, is if, to your knowledge, this statement which was filed with the Court

1 accurately represents Baupost's
2 holdings?

3 MR. SEILER: At the time it
4 was filed?

5 MR. QURESHI: At the time it
6 was filed.

7 MR. SEILER: You can answer.

8 THE WITNESS: At the time it
9 was filed, yes.

10 BY MR. QURESHI:

11 Q. Have those holdings changed
12 since the time it was filed?

13 MR. SEILER: You can answer.

14 THE WITNESS: Our shares of
15 PG&E Corporation common stock have
16 not changed. \$850,000 in other
17 unsecured wildfire related claims
18 have not changed. Our wildfire
19 relates subrogation claims have
20 changed.

21 BY MR. QURESHI:

22 Q. How has that changed?

23 A. It's increased.

24 Q. To what amount?

25 A. Approximately --

1 MR. SEILER: Do you know what
2 amount would be for this purpose
3 or --

4 THE WITNESS: Yeah.

5 MR. SEILER: How would -- how
6 would you --

7 THE WITNESS: Yeah.

8 MR. SEILER: Because this --
9 if you look at Footnote 1, it
10 defines what that includes.

11 MR. QURESHI: Apples to
12 apples with what's in the 2019.

13 MR. SEILER: Okay.

14 THE WITNESS: Let me read
15 Footnote 9, please.

16 BY MR. QURESHI:

17 Q. Sure.

18 MR. SEILER: You also need to
19 read -- I think --

20 THE WITNESS: I see it.

21 MR. SEILER: Of the -- the
22 little Footnote 1.

23 THE WITNESS: Yeah, my
24 best -- this is my best guess that
25 number again would be

approximately 6 billion.

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